

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT POOLEY,

Defendant.

CASE NO. 2:21-CR-111 WBS

DECLARATION OF KATHERINE T. LYDON

I, Assistant United States Attorney Katherine T. Lydon, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. Attached hereto as Exhibit 1 are communications from USPA regarding steps taken and retraining requirements in the wake of the fatal tandem accident with respect to approximately 140 tandem instructor candidates taught by Pooley and/or Y.G during the period of Pooley's suspension.
2. Attached hereto as Exhibit 2 are FAA Inspector David Jensens's notes from his meeting with Bill Dause in which Dause gave him Kwon's USPA and UPT paperwork, and a copy of those documents.
3. Attached hereto as Exhibit 3 are Jensen's interview notes from his meeting with Pooley.
4. Attached hereto as Exhibit 4 are two letters by Pooley exonerating Y.G. and explaining he used Y.G.'s signature without his knowledge.

Dated: April 15, 2024

By: /s/ Katherine T. Lydon
Katherine T. Lydon
Assistant United States Attorney